

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ROBERT S. KELLY,)	
)	
Plaintiff,)	
)	
-vs-)	No. 23 CV 15885
)	
UNITED STATES OF AMERICA,)	
BOP OFFICER TAWANA F. INGRAM,)	
UNKNOWN JOHN AND JANE DOE)	Hon. Elaine E. Bucklo
BOP OFFICERS, LATASHA KEBE)	
(also known as "TASHA K").)	

MOTION TO WITHDRAW AS ATTORNEYS OF RECORD

Pursuant to Northern District of Illinois Local Rule 83.17, Jennifer Bonjean, Ashley Cohen and Gabriella Orozco of the Bonjean Law Group, PLLC, attorneys for Plaintiff Robert S. Kelly (“Mr. Kelly”), respectfully moves this Court for leave to withdraw as attorneys of record in the above-captioned case:

1. Plaintiff filed his complaint in the above-captioned matter on November 13, 2023. [Dkt. 1].
2. On November 15, 2023, attorneys Jennifer Bonjean and Ashley Cohen of the Bonjean Law Group filed Notices of Appearances on behalf of Mr. Kelly. [Dkts. 2, 3].
3. Attorney Gabriella Orozco, also an attorney of the Bonjean Law Group, filed an appearance on behalf of Mr. Kelly on July 29, 2024. [Dkt. 29]
4. On January 21, 2025, Beau Brindley of the Law Offices of Beau B. Brindley filed a Motion for Leave to Appear on behalf of Mr. Kelly, indicating that

he is a member in good standing of the trial bar in the Northern District of Illinois. [Dkt. 44].

5. On January 22, 2025, this Court granted Mr. Brindley's motion. [Dkt. 45]

6. On February 12, 2025, Edward McDavid of the Law Offices of Beau B. Brindley also filed his appearance on behalf of Plaintiff. [Dkt. 46].

7. Attorneys from the Bonjean Law Group now seek permission to withdraw as attorneys of record for Mr. Kelly in this matter pursuant to Local Rule 83.17.

8. The undersigned certify that Mr. Kelly has been provided notice of Bonjean Law Group's intent to withdraw in this matter and has consented to same.

9. The undersigned also certifies that the circumstances support withdrawal, and that Bonjean Law Group's withdrawal from the representation is consistent with the rules of conduct for this jurisdiction.

10. Given the fact that Mr. Kelly now has two attorneys of record from the Law Offices of Beau B. Brindley, one of whom is a member of the trial bar in this Court, the Bonjean Law Group is confident Mr. Kelly will remain well represented during the pendency of this litigation.

11. Bonjean Law Group's withdrawal will not prejudice any party where Mr. Brindley and Mr. McDavid have already signed the protective order in this matter and have been provided all of the discovery from this litigation thus far.

WHEREFORE, the undersigned attorneys, Jennifer Bonjean, Ashley Cohen and Gabriella Orozco of Bonjean Law Group respectfully request that this Court grant this Motion to Withdraw and terminate Jennifer Bonjean, Ashley Cohen and Gabriella Orozco as attorneys of record for Plaintiff Robert S. Kelly in this matter.

Respectfully Submitted,

ROBERT S. KELLY

/s/ JENNIFER BONJEAN
/s/ ASHLEY COHEN
/s/ GABRIELLA OROZCO
Attorneys for Robert Kelly

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